

From: [GAINER Tom](#)
To: [GAINER Tom](#); [ANDERSON Jim M](#); [Kristine Koch/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Garner, Erin \(Kelly Services\)](#); [Mike_Edwards@URSCorp.com](#); [Chris_Moody@URSCorp.com](#)
Cc: [LARSEN Henning](#)
Subject: RE: ARCO Source Control
Date: 12/04/2006 05:19 PM

All-

Please remember to attend the meeting described below this **Thursday at 2 PM** (check in at the 15th floor reception, not suite 900). Based on previous communications, I'm assuming you are all attending. Please contact me ASAP if you cannot attend.

Thanks-
Tom Gainer

-----Original Message-----

From: GAINER Tom [mailto:Tom.Gainer@state.or.us]
Sent: Thursday, October 19, 2006 10:29 AM
To: ANDERSON Jim M; koch.kristine@epa.gov; Blischke.Eric@epamail.epa.gov; Humphrey.Chip@epamail.epa.gov; [@Garner, Erin \(Kelly Services\)](mailto:Garner, Erin (Kelly Services)); Mike_Edwards@URSCorp.com; Chris_Moody@URSCorp.com
Cc: GAINER Tom; LARSEN Henning
Subject: RE: ARCO Source Control

Please plan on attending a meeting to discuss proposed source control measures at the Arco Site on **Thursday, December 7, 2006 at 2 PM** at URS's office located at 111 SW Columbia, Suite 900 in Portland. The meeting objectives are described below.

Thanks-
Tom

-----Original Message-----

From: ANDERSON Jim M [mailto:Jim.M.Anderson@state.or.us]
Sent: Tuesday, October 03, 2006 2:38 PM
To: koch.kristine@epa.gov; Blischke.Eric@epamail.epa.gov; Humphrey.Chip@epamail.epa.gov
Cc: GAINER Tom; LARSEN Henning
Subject: ARCO Source Control

The purpose of this e-mail is to update you on some recent actions at the ARCO site, seek your agreement on a general path forward, & seek your participation in future project actions.

Background

DEQ, EPA, & ARCO met 5/4/06. In that meeting, ARCO presented an overview of the site, operations, & previously completed source control measures. ARCO said that the existing concrete seawall/revetment (which was installed years ago for geotech/stability reasons, not source control) is failing; needs to be removed; & a new seawall needs to be constructed. ARCO advised that a sheet pile wall needs to be installed along their entire shoreline for slope stability. ARCO also proposed to do a riverward sediment removal during the demolition of the seawall/revetment, if the extent of contaminated sediment was limited to the beach & near shore area (i.e., sediment contamination did not extend very far into the river). ARCO proposed to do an in-water, sediment investigation in summer '06 to determine the extent of contamination. DEQ & ARCO both understood that EPA was, at least initially, willing to let ARCO do the proposed

work (demolition, limited sediment removal, & construction of a new seawall) under DEQ oversight with support from EPA..., with the understanding that sediment removal would be restricted to the near-shore area.

9/28/06 DEQ/ARCO Meeting

ARCO summarized the results of their summer '06 sediment investigation &, using a cleanup target of 340 mg/kg TPH-D, concluded that sediment contamination did not extent very far from the shore. ARCO advised us that they believed the sediment removal could be completed by removing 2/3 of the sediment from the beach & 1/3 of the sediment from the river near the shore during seasonal low water. ARCO expects to submit a Basis for Design Report to DEQ in late-11/06. ARCO expects to secure the necessary permits & contractors to do the sheet pile wall installation, revetment demolition, & sediment removal in summer '07.

Input from EPA

- 1) We'll schedule DEQ's ARCO PM, Tom Gainer, to attend the 10/12 meeting with Kristine, Matt, & I. Tom can give a more in-depth explanation of the site, source control, sediment investigation, & ARCO's new proposal.
- 2) We want to verify that EPA is still willing to allow ARCO's proposed work to proceed under DEQ oversight. We'll want to share the results of the sediment investigation & ARCO's proposal for sediment removal with you before you make your final decision.
- 3) Engage Kristine as EPA's lead supporting DEQ's likely oversight of ARCO's work. Kristine would coordinate with Chip & Eric so that they can integrate ARCO's source control work with the in-water RI/FS. In addition to EPA's support from the source control perspective, we request EPA input on the compatibility of this sediment removal project with the anticipated final in-water remedy. In other words, we want Chip & Eric to weigh-in on whether ARCO's yet to be proposed sediment removal action levels can reasonably be expected to achieve final clean-up levels for the RI/FS.

Action Items

- 1) DEQ will schedule a meeting between ARCO/DEQ/EPA for ARCO to roll-out the results of their sediment investigation & source control proposal in early-12/06.
- 2) EPA should respond with any initial comments to this approach & confirm your willingness to attend a 12/06 project roll-out meeting.

James M. Anderson
DEQ Northwest Region
Portland Harbor Section
Phone (503) 229-6825
Fax (503) 229-6899